

# Exhibit G

**Bober, Matthew S.**

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**From:** William Franklin <bfranklin@bdfllawfirm.com>  
**Sent:** Monday, May 23, 2022 8:42 AM  
**To:** Masson, Jeffrey A.  
**Cc:** Williams, Nicole L.; Cox, Daniel C.; Bober, Matthew S.; Jeff.Todd@mcafeetaft.com;  
Chandler Patterson; Don C. Dennis; Orion Hutchin  
**Subject:** RE: Notice of Deposition to Non-Party Seth Fortenberry

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Mr. Masson:

Per our conversation and my letter last week, my client is not agreeable to providing all of the documents requested. We are in the process of preparing a motion to quash. It is my understanding that you have agreed to move the deposition date until such time as we get a ruling on the objections. If that is not correct, please let me know. Likewise, if you have any questions or wish to discuss further please contact me.

Thanks,

Bill

**William A. (Bill) Franklin**  
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**From:** Masson, Jeffrey A. <JMasson@thompsoncoburn.com>

**Sent:** Sunday, May 22, 2022 12:39 PM

**To:** William Franklin <bfranklin@bdfllawfirm.com>

**Cc:** Williams, Nicole L. <NWilliams@thompsoncoburn.com>; Cox, Daniel C. <DCOX@thompsoncoburn.com>; Bober, Matthew S. <MBober@thompsoncoburn.com>; Jeff.Todd@mcafeetaft.com; Chandler Patterson <cpatterson@bdfllawfirm.com>; Don C. Dennis <dcdennis@bdfllawfirm.com>; Orion Hutchin <OHutchin@bdfllawfirm.com>

**Subject:** Re: Notice of Deposition to Non-Party Seth Fortenberry

Mr. Franklin,

Please recall, we spoke by phone Thursday May 19 after I received your email and letter from the below attached email.

I understood from our phone conversation that you would be filing a motion to quash the subpoena as you and your client would not agree to produce the records sought with the deposition subpoena. I have not observed the filing of a motion to quash.

Please let me know if your client has changed his intentions and now plans to appear with the records.

Thank you

Sent from Jeff Masson by iPhone

On May 19, 2022, at 4:06 PM, Orion Hutchin <[OHutchin@bdfllawfirm.com](mailto:OHutchin@bdfllawfirm.com)> wrote:

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Good afternoon Counsel:

Please see the attached with regard to the above-referenced matter.

We appreciate your prompt attention to the same.

Orion

Orion Hutchin

Attorney

**BOERNER, DENNIS & FRANKLIN, PLLC**

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